UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DISTRICT

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No. 4:14CR00175 AGF (DDN)
MARK PALMER, SAMUEL LEINICKE, CHARLES WOLFE, a/k/a "Chuck Wolfe," ROBERT WOLFE, and JOSEPH GABRICK)))))
Defendants.)

GOVERNMENT'S MOTION FOR ADDITIONAL TIME TO FILE RESPONSE TO DEFENDANTS' MOTIONS TO DISMISS AND MOTION FOR BILL OF PARTICULARS

Comes now the United States of America, by and through its attorneys, Richard G.

Callahan, United States Attorney for the Eastern District of Missouri, and James C. Delworth,

Jennifer Winfield, and Erin Granger, Assistant United States Attorneys for said District, and for its Motion for Additional Time to File Responses to Defendants' Motions to Dismiss (Doc. Nos. 181, 182, and 185) and Defendants' Motion for Bill of Particulars (Doc. No. 184) states as follows:

- Defendants are charged with *inter alia*, conspiracy to distribute and to possess with
 the intent to distribute Schedule I controlled substances and Schedule I controlled
 substance analogues intended for human consumption and conspiracy to introduce
 misbranded drugs into interstate commerce.
- 2. On October 8, 2015, Defendants filed three separate motions to dismiss the indictment and one motion for a bill of particulars.

3. Due to the number of issues and volume of material involved in this motion response as well as the undersigned's current workload, the Government requests additional time in which to respond.

WHEREFORE, Counsel for the Government respectfully request this Honorable Court to grant the government a one-week extension of time, up to and including **November 16, 2015**, in which to file responses to Defendants' motions.

Respectfully submitted,

RICHARD G. CALLAHAN United States Attorney

s/ Erin Granger
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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

<u>s/ Erin Granger</u>ERIN GRANGER, #53593MOAssistant United States Attorney